

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION, Trustee-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (SMB) SIPA Liquidation (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff, Plaintiff, v. NATIXIS, NATIXIS CORPORATE & INVESTMENT BANK (f/k/a IXIS CORPORATE & INVESTMENT BANK), NATIXIS FINANCIAL PRODUCTS, INC., BLOOM ASSET HOLDINGS FUND, and TENSYSR LIMITED, Defendants.	Adv. Pro. No. 10-05353 (SMB)

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Trustee may respond to the Motion to Dismiss filed by Defendant Natixis Financial Products LLC (as successor in interest to Natixis Financial Products Inc.) (“Natixis FP”) is extended up to and including March 9, 2018. It is further stipulated and agreed

that Natixis FP shall file its reply by June 1, 2018. The pre-trial conference was not previously set, but will now be scheduled for June 27, 2018 at 10:00 a.m. The return date for this matter was not previously set, but will now be scheduled for May 30, 2018 at 10:00 a.m.

The extension of time granted by this stipulated extension (the “Stipulation”) is without prejudice to any future extensions of time.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses the Trustee and Natixis FP may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 16718).

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Dated: December 1, 2017
New York, New York

BAKER & HOSTETLER LLP

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Liquidation of Bernard L. Madoff
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*Attorneys for Defendant Natixis Financial
Products LLC (as successor in interest to
Natixis Financial Products Inc.)*

SO ORDERED this 1st day of December,
2017.

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCTY JUDGE